

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN

Mitchell Sproessig, #299543

Plaintiff,

v.

Blessman, et al.

Defendants.

Case No: 1:19-cv-00693
District Judge: Hala Y. Jarbou
Magistrate Judge: Ray Kent

MITCHELL SPROESSIG, #299543
Lakeland Correctional Facility
141 First St.
Coldwater, MI 49036
Pro Se Plaintiff

CHAPMAN LAW GROUP
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AFFIDAVIT OF KEITH PAPENDICK, M.D.

STATE OF MICHIGAN)
) ss
COUNTY OF INGHAM)

I, KEITH PAPENDICK, M.D., first being duly sworn on oath, state that if I were called to testify as a witness in this matter, I would testify to the following facts based upon my personal knowledge and review of Mitchell Sproessig's Michigan Department of Corrections medical chart:

1. On all dates relevant to Plaintiff's Complaint, I was a physician licensed in the State of Michigan.
2. I was the Outpatient Utilization Manager Medical Director during the time period relevant to this case.
3. As the Outpatient Utilization Manager Medical Director, I am not involved in the day-to-day medical care of inmates. My involvement with patient care includes evaluation


- of requests for medical services and consultations that cannot be provided onsite at the correctional facility.
4. In making recommendations, I review a medical provider's healthcare request and the associated medical records either identified by the medical provider or associated with the out-patient healthcare request based on the information provided to me by the medical provider.
 5. Based on my review of the information provided to me by the medical provider and in the exercise of my informed medical judgment, I make recommendations regarding the appropriate course of treatment, which may be approving the treatment requested or recommending an alternative treatment plan. My recommendations are based on evidenced-based medicine and medical necessity.
 6. If a provider disagrees with my recommendation, there is an appeal process which involves further discussion with me, the Regional Medical Director, and the State Medical Director. If the provider is still dissatisfied, he or she can discuss further treatment options with the MDOC.
 7. On January 29, 2019, Mr. Sproessig's medical provider submitted a 407 healthcare request surgery consultation for a ventral hernia that did not spontaneously reduce. Plaintiff had a "significantly enlarged" ventral hernia which did not spontaneously reduce. I reviewed the 407 request and relevant medical records and determined that spontaneous reduction was not a criterion for hernia consult or repair. I relied on InterQual data to determine Plaintiff did not qualify for a surgical consultation at the time of the request.

8. InterQual data is an evidence-based support solution that assists medical providers in making clinically appropriate medical utilization decisions.
9. This was my only and last involvement in Mr. Spreossig's care during the relevant time period.
10. My involvement with Mr. Spreossig's care as it relates to the allegations in his Complaint is limited to the issues set forth in this affidavit. The matters stated in this Affidavit are based on my personal knowledge and review of his Michigan Department of Corrections medical records during the relevant time period.
11. I do not believe that I, in any way, acted with deliberate indifference in Mr. Spreossig's case, as I treated him in a manner that I, in my medical judgment, feel was appropriate.

Further affiant sayeth not.


KEITH PAPENDICK, M.D.

Subscribed and sworn to before me
This 17 day of Dec, 2021.


Notary Public, State of Michigan
County of Calhoun
My Commission Expires: June 19, 2027
Acting in the County of Calhoun

WENDY S ELKINS NOTARY PUBLIC - STATE OF MICHIGAN CALHOUN COUNTY MY COMMISSION EXPIRES JUNE 19, 2027 ACTING IN THE COUNTY OF <u>Calhoun</u>
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